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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

3:14-CR-00184-JO

v.

**BILL OF PARTICULARS FOR
FORFEITURE OF PROPERTY**

**RACHEL LEE,
BLANCEY LEE,
 aka BLANCEY ADAMS,
PORSHA LEE, and
SAMANTHA LEE,
 aka PEBBLES LEE,
 aka BUBBLES LEE,**

Defendants.

The United States of America, by and through S. Amanda Marshall, United States Attorney for the District of Oregon, and Donna Maddux and AnneMarie Sgarlata, Assistant United States Attorneys, hereby files the following Bill of Particulars for Forfeiture of Property.

The United States gives notice that in the forfeiture allegation of the Indictment, the United States is seeking forfeiture of the following property:

- (1) **MONEY JUDGMENT** - A sum of money representing the amount of proceeds obtained as a result of the offense of wire fraud, for which the defendants are jointly and severally liable, in the form of a money judgment;
- (2) **REAL PROPERTIES:**
 - (a) **309 SE 1st AVENUE AND 126 S. KNOTT STREET, CANBY, CLACKAMAS COUNTY, OREGON**, and more particularly described as:

Parcel I:

Lots 8 and 9, ALBERT LEE'S SECOND ADDITION TO THE CITY OF CANBY, in the city of Canby, County of Clackamas and State of Oregon.

EXCEPTING THEREFROM the Southeasterly 46 feet conveyed to Edward Hiller and wife by Deed recorded April 5, 1937, in Book 200, Page 636, Clackamas County Deed Records.

Parcel II:

The Southeasterly 45 feet of Lots 8 and 9, ALBERT LEE'S SECOND ADDITION TO THE CITY OF CANBY, in the City of Canby, Clackamas County, Oregon, described as follows:

Beginning at the Southerly corner of said Lot 8, on M Street; thence Northwesterly, along the Northeasterly line of M street, 46 feet; thence Easterly, at right angles to M Street, 100 feet to the Northeasterly line of said Lot 9; thence Southeasterly, on said Northeasterly line of Lot 9, 46 feet to the most Easterly corner of said Lot 9; thence Southwesterly, on the Southeasterly line of said lots, 100 feet to the place of beginning;

- (b) **422 SE 16th AVENUE, HILLSBORO, WASHINGTON COUNTY, OREGON**, and more particularly described as:

Lots 3, 4 and the North one-half of Lot 5, Block 1, BROWN'S SUBDIVISION OF BLOCKS "H AND I" IN FAIRVIEW ADDITION TO HILLSBORO OREGON, in the City of Hillsboro, County of Washington and State of Oregon.

Tax ID# R315260;

- (c) **1316 AND 1320 NE BROADWAY STREET, PORTLAND, MULTNOMAH COUNTY, OREGON**, and more particularly described as:

**The West 40 feet of Lots 7 and 8, Block 226, HOLLADAY'S ADDITION TO EAST PORTLAND, in the City of Portland, Multnomah County, Oregon.
EXCEPTING the North 10 feet thereof taken for the widening of NE Broadway Street. Tax Account No. R182408;**

(d) 196 S.E. 3rd STREET, BEND, DESCHUTES COUNTY, OREGON, and more particularly described as:

Lot 13 in Block 186 of THIRD ADDITION TO BEND PARK, City of Bend, Deschutes County, Oregon;

(e) 260 S. KNOTT STREET, CANBY, CLACKAMAS COUNTY, OREGON, and more particularly described as:

Part of Section 33, Township 3 South, Range 1 East of The Willamette Meridian, in the City of Canby, County of Clackamas and State of Oregon, Described as Follows:

Beginning at a point which is North 26 West and 400 feet distant from the Southeast corner of a Tract described in Deed Recorded January 16, 1884 in Deed Book "X", Page 169, Clackamas County deed records; Thence North 26 West, 50 feet; Thence South 64 West, 125 feet; Thence South 26 East, 50 feet; Thence North 64 East 125 feet to the place of beginning;

(f) 623 MAIN STREET, HILLSBORO, WASHINGTON COUNTY, OREGON, and more particularly described as:

PARCEL I:

Commencing at a point on the South line of Lot 5 , Block 2, ENNES ADDITION TO THE CITY OF HILLSBORO, in the City of Hillsboro, County of Washington, State of Oregon, which point is 87 feet 7 inches West of the Southeast corner of Lot 6, said Block 2; running thence West, along the South line of Lot 5, Block 2, 65 feet; thence North 200 feet; thence East 65 feet; thence South 200 feet, more or less, to the place of beginning.

EXCEPTING THEREFROM that certain tract described in deed recorded in Book 165, Page 256, Records of Deeds of Washington County, Oregon.

TOGETHER WITH that portion of vacated alley running East and West through said Block 2 which inured thereto by reason of City of Hillsboro action entered December 12, 1900 in Book 2, Page 204 and recorded December 22, 1983, Fee No.83047308.

PARCEL II:

Situated in Section 31, Township 1 North, Range 2 West of the Willamette Meridian, City of Hillsboro, Washington County, Oregon and being a part of Lots 5 and 6 plus a portion of the vacated alley, all in Block 2, Ennes Addition to Hillsboro, a plat of record in said county, described as follows:

Beginning at the southeast corner of the Manley tract as described in Deed Book 216, Page 217, said County Records, common with the southwest corner of the Scheller tract as described in Deed Document No. 95082331, and being on the north right of way of East Main Street, and running thence North 02°22'20" East, on the common line between aforesaid tracts, 211.17 feet to a point in the center of the vacated alley, said Block 2, Ennes Addition; thence South 86°43'50" East, in the center of the vacated alley, 85.45 feet to a point on the west line of that tract described in Deed Book 1046, Page 131; thence South 02°31'35" West, parallel with NE 7th Avenue, on aforesaid tract west line, 60.00 feet to the southwest corner thereof; thence North 86°43'50" West 10.00 feet to a point; thence South 02°31'35" West 24.33 feet to a point; thence North 86°43'50" West 65.22 feet to a point; thence South 02°22'20" West, parallel to and 10.00 feet distant from the east line of the Manley tract as described in Deed Book 216, Page 217, said County Deed Records, 127.57 feet to a point on the north right of way of East Main Street; thence North 82°31'13" West, on said right of way, 10.04 feet to the point of beginning.

(This legal description was created prior to January 1, 2008.)

PARCEL III:

Parcel 1 of Partition Plat No. 2008-027, in the city of Hillsboro, Washington County, Oregon;

(g) 1180 NEWBERG HIGHWAY, WOODBURN, MARION COUNTY, OREGON, and more particularly described as:

Part of George Leasure Donation Land Claim in Township 5 South, Range 1 West of the Willamette Meridian, Marion County, Oregon, more particularly described as follows:

Beginning at the Northeast corner of Lot 1 of HALL'S HOME TRACTS; thence South 13°24' West along the easterly line of said Lot, 140 feet; thence North 88°30' West 48.0 feet; thence North 0°45' East 135.0 feet to the North line of said Lot 1; thence South 88°30' East 78.50 feet to the point of beginning;

3. VEHICLES:

- (a) 2012 Ferrari California, VIN ZFF65TJA8D0189279;
- (b) 2012 Bentley Mulsane, VIN SCBBB7ZHXCC016796;
- (c) 1955 Chevrolet Bel-Air, VIN VC550024100;
- (d) 2012 Mercedes Benz 550, VIN WODNG9E84CA445894;

4. UNITED STATES CURRENCY FUNDS OR OTHER MONETARY INSTRUMENTS:

- (a) **Cashier's check no. 1111521340, in the amount of \$1,001,388.73, from Wells Fargo Bank Account ending in xxx8579;**
- (b) **Cashier's check no. 862835, in the amount of \$899,580.38, from Columbia State Bank Account ending in xxx1074;**
- (c) **Cashier's check no. 862833, in the amount of \$1,396.51, from Columbia State Bank Account ending in xxx9334; and**
- (d) **\$40,000 in United States Currency.**

DATED this 12th day of May, 2014.

S. AMANDA MARSHALL
United States Attorney

Anne Marie Sgarlata
ANNEMARIE SGARLATA
Assistant United States Attorney